

**EPA/AMD/R03-90/507
1990**

**EPA Superfund
Record of Decision Amendment:**

**WESTLINE
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WESTLINE, PA
03/30/1990**



EPA

Superfund Record of Decision:

Westline, PA



EPA/ROD/R03-90/086

Westline, PA

First Remedial Action (Amendment)

Abstract (continued)

material. This ROD amends a July 1986 ROD, which called for the excavation and offsite incineration and disposal of waste tar from an onsite tar pit and the interspersed tar deposits along Kinzua Creek. There are no longer any primary contaminants of concern affecting the soil at the site.

The selected remedial action for this ROD amendment is no further action. Because some tar material will remain onsite, EPA will monitor the site to prevent unacceptable exposure from the waste tar, and a five-year review will be scheduled. No costs were specified for this no action remedy.

Record of Decision Amendment
to the July 3, 1986 Record of Decision
for the Westline Site

SITE NAME AND LOCATION

Westline Site, McKean County, Pennsylvania

STATEMENT OF BASIS AND PURPOSE

This decision document presents a change in the remedial action selected for the Westline Site, Westline, Pennsylvania, chosen on July 3, 1986 in accordance with the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), and to the extent practicable, the National Contingency Plan (NCP). This decision is based on the Administrative Record for this site.

DESCRIPTION OF THE AMENDED REMEDY

The previous Record of Decision (ROD) signed on July 3, 1986 called for excavation of waste tar from the existing pit behind the Westline Church and the interspersed tar deposits along Kinzua Creek. The waste tar was to be incinerated offsite.

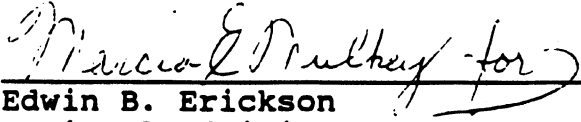
During the summer of 1988, EPA began to implement that remedial action and within the first few weeks of excavation, EPA determined that the volume of tar was much greater than originally estimated. In 1986, EPA thought 800 tons of soil/tar had to be excavated but revised estimates were eight times greater. During this summer of record heat, EPA found tar in many places it had not been previously detected. By November 1988, EPA had excavated the tar pit behind the church which presented the greatest threat of potential dermal exposure and some of the interspersed tar deposits along Kinzua Creek. These materials were transported offsite for incineration and disposal. Operations had to be closed down for the winter season.

By the spring of 1989, EPA decided to reevaluate the public health and environmental risks posed by the remaining waste tars at the site.

Based on the Updated Risk Assessment employing the newer risk criteria, the decrease for potential exposure and an improved model, EPA has determined that no further action is necessary at this site because the tar material no longer poses an unreasonable health risk.

DECLARATION STATEMENT

EPA has selected the "No Further Action" alternative for the remaining tar onsite because the largest lagoons of tar deposits have been removed and there is adequate protection for human health and the environment based on the actions taken to date. It should be noted that a review of the site will be conducted every five years in accordance with Section 121(c) of CERCLA, 42 U.S.C. Section 9621(c), to prevent unacceptable exposures from the waste tar materials since some of the tar will remain onsite.



Edwin B. Erickson
Regional Administrator,

3/30/90
Date

Summary of Amended Remedial Alternative Selection

Site Location and Description

The Westline Site is located in the rural community of Westline, Lafayette Township, McKean County, Pennsylvania. The town is located in northwest Pennsylvania and is approximately 15 miles south-southwest of Bradford, Pennsylvania and 8 miles northwest of Kane, Pennsylvania.

The town of Westline is situated along Kinzua Creek and is completely surrounded by the Allegheny National Forest. Located in the center of the town is the Westline Inn, which is the town's major landmark which is within the site boundaries.

The site contamination consists of several areas where tar-like deposits were placed. The compounds detected in the tar-like deposits included phenol compounds and polycyclic aromatic hydrocarbons (PAHs). The tar deposits were from the operations of the chemical plant described below. The chemical plant disposed of the tar materials in lagoons outside of the building. The company also dug small canals to allow the tar materials to migrate downhill towards the banks of Kinzua Creek. Another factor which contributed to the spread of the tar deposits was the natural flooding events throughout the site area. The two largest lagoons of tar deposits were removed by EPA as part of the 1983 removal action and the 1988 remedial action.

Site History

In the late 1890's, Ralph Day and his son Edmund purchased thousands of acres of land extending east of Thundershower Run in McKean County, Pennsylvania to the small town of Guffy. Timber rights were obtained and a chemical plant was constructed in the town of Westline. The plant, known as the Day Chemical Company, began operating in 1901. The plant converted lumber into charcoal, methanol, and acetic acid. The basic process consisted of heating the lumber in the absence of oxygen, to a very high temperature, driving off the chemicals and turning the remaining wood into charcoal. The company changed ownership several times throughout the 1900's and was finally closed in the summer of 1952.

Today, all that is left of the chemical plant is the foundation. The plant site, located behind the Westline Inn, is presently covered with demolition debris and is overgrown. Most of the thousands of acres bought by Ralph and Edmund Day in the late 1890's are now part of the Allegheny National Forest.

History of EPA Removal and Remedial Actions

The initial site inspection was conducted in July of 1982. The site was scored under the Hazard Ranking System worksheets in September of 1982 and the resulting score was 40.38. The site was subsequently proposed for the National Priorities List.

In February of 1983 EPA Region III began an Immediate Removal Action at the site. In April 1983 the largest lagoon of tar deposits which was located in the parking lot of the Westline Inn, was capped to prevent offsite migration. By August 1983 it became apparent that the clay cap was inadequate and excavation and removal of tar materials would be necessary. Variations in temperature and the water table level caused some of the tar to break through the capped area. Therefore, excavation began on August 29, 1983. Two thousand tons of tar and contaminated soil were removed from the site by CECOS International, Inc. and taken to CECOS' disposal site in Niagara Falls, New York. The Removal Action was completed on September 14, 1983. In September 1983, the Westline Site was placed on the final National Priorities List.

The Remedial Action began in March of 1983 when a work assignment was issued to NUS Corporation. NUS prepared a Remedial Action Master Plan (RAMP) in October 1983. The RAMP summarized all previous information. By August of 1984 NUS prepared a work plan for the Remedial Investigation/Feasibility Study (RI/FS). NUS completed the final RI/FS Reports by July 1986, and a Record of Decision (ROD) to address the waste tar was signed July 3, 1986. This ROD called for excavation of the waste tar/soil mixture and offsite incineration. The ROD also required a ground water verification study for some "non tar-related" compounds found during the Remedial Investigation. The Ground water Verification Study and the Remedial Design work for offsite incineration began in the fall of 1986. EBASCO/NUS prepared the work plans and conducted the additional field studies in the summer of 1987. The Ground water Verification Study reports were issued in December 1987 and a second Record of Decision was signed on June 29, 1988. The ground water ROD stated that concentrations of benzene were decreasing with time and that the aquifer should flush out the contaminants within five to ten years; therefore, a No Action Alternative with continued monitoring was selected.

The Remedial Design bid specifications for the excavation and offsite incineration of the waste tar/soil mixture were completed in June of 1987 and the Agency selected EBASCO/NUS for the Remedial Action activities. Actual field work began at the Westline site in May of 1988 and continued through the summer and fall until the end of November 1988. A total of 2,340 tons of

tar and soil were excavated and the area was backfilled with clean soil, but there was still a significant amount of the tar left in other areas. By January 1989, EPA received estimates that at least 4,000 tons of material were left at the site in the areas planed for excavation. At the same time the Agency recognized that recent research into the risks associated with the PAHs should be used to refine the original risk assessment conducted in 1986. In August 1989 a document titled "Final Risk Assessment Update" was issued. This document is the basis for the change in remedial actions described in this amendment to the 1986 ROD.

Summary of Site Risks

The Updated Risk Assessment was developed to determine whether the intermittent tar deposits and tar-contaminated soils remaining at the Westline Site present unacceptable public health risks. The Risk Assessment originally prepared during the Remedial Investigation of April 1986 is outdated by current (1989) risk assessment standards. The Remedial Action (excavation) conducted at the site in 1988 removed the largest open area of tar in the lagoon behind the Westline Church and also provided additional information about the depth and quantity of the tar materials beneath the ground surface. Most of the tar is actually three feet below the surface and will not be a dermal contact threat.

The updated assessment incorporates two major technical revisions that present the most up-to-date guidance available on polycyclic aromatic hydrocarbons (PAHs) in the environment. The first change is a revised method of assessing risks related to PAHs, which are the major site contaminants. In the past, EPA used a one-to-one equivalency approach that treated all PAHs as though they were benzo(a)pyrene. Benzo(a)pyrene has been widely studied and is a probable human carcinogen. This approach greatly overestimates the risks associated with PAHs that do not exhibit the high carcinogenic potency of benzo(a)pyrene. Therefore, researchers have developed "relative potency estimates" based on benzo(a)pyrene, which treat each potentially carcinogenic PAH individually.

The second change is the revision of common exposure assumptions. Exposure assumptions are predictions of how a person could consume, inhale, or come into physical contact with contaminated soil or wastes. EPA recently published The Risk Assessment Guidance for Superfund (December 1989) which is based on large amounts of data that describe the frequency of certain activities, average body weights, average breathing rates, etc. These assumptions are more realistic estimates of potential types and durations of exposures than those used previously. The largest lagoon in the Westline Inn's parking lot was removed in

1983 and the other open lagoon was removed in 1988. This changed the likelihood of dermal exposure for the residents of Westline. Most of the remaining tar is below the surface in areas that are overgrown with trees and ferns. The possibility of direct contact with the tar is limited to one square foot puddles and the dermal exposures are limited to the hands, arms, neck and face rather than the entire body.

Using these revisions, a number of potential exposure scenarios were examined and the potential risks were compared to the risks presented in the RI Report in April 1986. The results, as presented in The Risk Assessment Update (August 1989), show that the residual soils and tar material present no potential carcinogenic risks greater than the range of acceptable risks commonly applied by EPA for Superfund sites.

A comparison of the risks calculated in the 1986 and the risks calculated in 1989 are shown in The Risk Assessment Update (August 1989) which is part of the Administrative Record.

Description of the Amended Remedy

The previous remedy for excavation and offsite incineration of the tar/soil mixture at the Westline site will not be continued. EPA has decided on "No Further Action" which means the tar material presently at the site will remain in place. The site will be monitored and a review of the site will be conducted every five years as required by Section 121(c) of CERCLA, 42 U.S.C. Section 9621(c).

Responsiveness Summary

Public participation activities performed to meet the requirements of Section 113 and 117 of CERCLA, 42 U.S.C. Section 9613 and Section 9617 and to support this amendment to the ROD included:

1. Preparation of the Administrative Record and placing additional documentation in the local repositories.
2. A press and public availability session was held on August 22, 1989 at the site. The Proposed Plan was distributed at that time.
3. The advertisement of the "No Further Action" proposal appeared in three local papers on August 23, 1989 and public comments were requested during the 30 day comment period following the notice. The newspapers also printed articles on the site interview conducted the day before.

4. No written comments were received in response to the public notice and no requests for the formal public meeting were made.
5. Based on conversations with several members of the community, the local residents seemed to agree with the change in the remedy, since the two major pits had been remediated. In fact some residents were happy that EPA finally decided to stop excavating. These residents had not agreed with the assesment of potential risks back in 1983-1986 and were pleased that their original position on No Action at the site had been decided by EPA was appropriate for the Westline Site.